

Message

From: Bahrman, Sarah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1D493CF492ED4FC0BE275A699826A64C-BAHRMAN, SARAH]
Sent: 11/21/2018 5:57:01 PM
To: Shea, Valois [Shea.Valois@epa.gov]
CC: Minter, Douglas [Minter.Douglas@epa.gov]
Subject: RE: Summary of Call with John Mays, Tuesday, Nov 13

Hi Valois and Douglas –

Thanks for the helpful summary of your call last week. I talked to Darcy yesterday, and wanted to share two things:

- 1) She said we should not invest at all in researching or implementing a process to share documents like NRC has because Powertech was satisfied with the approach you discussed (to do public notice and discuss with them in more detail prior to PN).
- 2) Darcy is meeting with Megan Garvey on Monday 11/26 to discuss EJ. She'll let us know the decision.

Thanks,
Sarah

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From: Shea, Valois
Sent: Monday, November 19, 2018 10:25 AM
To: O'Connor, Darcy <oconnor.darcy@epa.gov>
Cc: Minter, Douglas <Minter.Douglas@epa.gov>; Bahrman, Sarah <Bahrman.Sarah@epa.gov>
Subject: Summary of Call with John Mays, Tuesday, Nov 13

1. AE Boundary Discussion:

Ex. 5 AC/DP

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2. Capture Zone Analysis:

- John is considering redoing the EPA's domestic well capture zone analysis that was part of the first AE ROD. They would use a model that more accurately calculates capture zones of wells that do not pump continuously. This approach will result in much smaller capture zones compared to the static pumping equation the EPA used.
- John can also provide information to document that some of the wells the EPA identified as domestic wells, based on historical records, are no longer domestic wells. This information will remove the wells associated with abandoned residences from the capture zone analysis.
- John will get back to us on this decision.

3. Discussion of what aspects of the NRC process for release of information to the public Azarga would like the EPA to emulate:

- Azarga asked the EPA to explore the NRC process for release of information to the public in order to provide more transparency in permit requirements and allow Azarga to have input on the permit requirements before the public comment period is initiated.
- We explained that our public review process is governed by the 40 CFR Part 124 regs that spell out clearly our public review process.
- We reiterated our commitment to discussing the new requirements in the 2nd Class III draft area permit and getting their input on feasibility.
- John was satisfied with this approach. It would help to have clarification from management on how much time and effort we should expend on exploring the NRC public review process.

4. Discussion of the buffer zone proposed in the Class III permit application.

- Azarga proposed a buffer zone of 1,600 feet between wellfields and the permit boundary.
- In comments provided on the Class III draft area permit, Azarga clarified that "wellfield" was intended to mean the injection and production wells and does not include the perimeter monitoring wells. This clarification will be included in the 2nd Class III draft area permit.
- Azarga now realizes that they need to change the buffer zone to 1,000 feet and will send the EPA a letter explaining the need for this change and provide a map.
- The change will be also be included in the 2nd Class III draft area permit.

Please let me know if I need to provide more explanation.

Thanks!

Valois

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